

203 Closure

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file



Illinois Environmental Protection Agency

2200 Churchill Road, Springfield, IL 62706

217/782-6762

Received: December 19, 1986

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Refer to: 1671205030 -- Sangamon County
Springfield/Industrial Chemical
ILD980702617

March 19, 1986

Industrial Chemical
2160 East Enterprise
Springfield, Illinois 62702

EPA Region 5 Records Ctr.



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Dear Mr. Thompson:

The closure plan submitted by Industrial Chemical and prepared by Larry Quinn has been reviewed.

Due to the following deficiencies, the plan has been found to be inadequate:

1. Compliance with the closure performance standard (725.211) and the requirement for disposal or decontamination of equipment (725.214) cannot be determined because a description of the storage area was not provided. At a minimum, this description must include the following information:
 - a. A scale drawing of the facility which indicates the location of the storage area(s);
 - b. A description of the surface of the storage area (soil, asphalt, concrete or aggregate); and
 - c. The structural integrity and containment devices of the storage area.
2. The closure plan did not include the following information required by 725.212:
 - a. The specific types of hazardous waste stored at the facility, their USEPA hazardous waste codes, and an estimate of the maximum inventory of each type of waste in storage at any time during the life of the facility (725.212(a)(2));
 - b. A description of the steps needed to decontaminate facility equipment during closure (725.212(a)(3)); and



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- c. An estimate of the expected year of closure and a schedule (preferably a bar chart) for closure (725.212(a)(4)). The schedule must indicate the total time required to close the facility, the time required for intervening closure activities which will allow tracking of the progress of closure, and meet the closure time limits set forth in 725.213.
3. The description of the closure of the container storage area is not adequate to meet the requirements of 725.211, 725.212(a)(3), and 725.214 because the following items were not provided:
 - a. Decontamination of the storage area which includes:
 1. method of decontamination;
 2. contaminants tested for and rationale for choosing those parameters;
 3. detection limits
 4. sample handling and analytical methods in accordance with SW-846;
 5. clean-up standards and method used to verify that the standards were reached;
 6. decontamination of equipment; and
 7. disposal of cleaning waste and residue.
 - b. Decontamination of soil under, adjacent to, or subject to run-off from the storage area, which includes:
 1. soil sampling plan, which includes a sampling grid pattern;
 2. soil analysis plan:
 - i. contaminants tested for,
 - ii. detection limits,
 - iii. sample handling and analysis in accordance with SW-846;
 3. removal of contaminated soil;
 4. clean-up standard and method used to verify that the standard was reached;
 5. decontamination of facility;
 6. decontamination of equipment; and
 7. disposal of cleaning waste and residue.
4. A closure cost estimate as required by 725.242 was not provided. This cost estimate must equal the cost of closure at the point in the facility's operating life when the extent and manner of its operation would make closure the most expensive. At a minimum, the cost estimate must include the costs for the following activities:
 - a. removal of waste inventory;
 - b. decontamination and/or removal of equipment;



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- c. disposal of wash water/cleaning waste;
 - d. sampling and analysis;
 - e. restoration of facility equipment and site;
 - f. certification of closure;
 - g. removal of contaminated soil; and
 - h. removal of standing liquids;
5. The closure plan did not provide a provision for certification by the owner or operator and by an independent registered professional engineer that the facility was closed in accordance with an approved closure plan (725.215).
6. The "Certification regarding potential releases from solid waste management units" was requested of your facility on December 24, 1985 but was never received by this Agency.
7. Copies of the manifests used to transport waste off-site during closure need to be provided with the certification of closure.

In addition to the deficiencies in the closure plan received on December 19, 1985, on-site observations by this Agency have determined that the following environmental concerns exist at this facility:

- a. A pit located on the east side of the vertical kerosene storage tank was observed during the May 28, 1985 I.S.S. inspection. The rock and earth within the pit were observed to be stained black. Therefore, the following items need to be provided:
 - 1. a description of the materials placed in the pit;
 - 2. the dimensions of the pit;
 - 3. soil sampling plan, which includes a sampling grid pattern;
 - 4. soil analysis plan:
 - i. contaminants tested for,
 - ii. detection limits,
 - iii. sample handling and analysis in accordance with SW-846;

If the soil analysis plan indicates that the soils in and around the pit are contaminated with hazardous waste, the following additional items need to be addressed:

- 5. removal of contaminated soil;
- 6. clean-up standard and method used to verify that the standard was reached;
- 7. decontamination of facility;
- 8. decontamination of equipment; and
- 9. disposal of cleaning waste and residue.



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- b. Agency inspections of the facility have documented many unmarked, unlabeled containers used to hold products which were stored outside in numerous locations on the facility's property. How were the contents of the "empty containers" determined prior to the reuse of the containers? How and where were the empty containers rinsed prior to reuse?
- c. Approximately 18 pallets of 5 gallon containers were observed at the facility during the January 21, 1986 inspection. Paint residue was observed to be on the containers. A solvent odor was detected in the vicinity of the pallets and was apparently emitted from the containers. The majority of the cans were rusted and deteriorated. The contents of these containers must be sampled and analyzed to identify if the waste in them is hazardous waste according to RCRA. If the contents are hazardous waste, they must be handled as such. Furthermore, the following items need to be provided for the soils under and around the area used to store these containers:
 - 1. soil sampling plan, which includes a sampling grid pattern;
 - 2. soil analysis plan:
 - i. contaminants tested for,
 - ii. detection limits,
 - iii. sample handling and analysis in accordance with SW-846;
 - 3. removal of contaminated soil;
 - 4. clean-up standard and method used to verify that the standard was reached;
 - 5. decontamination of facility;
 - 6. decontamination of equipment; and
 - 7. disposal of cleaning waste and residue.
- d. Pictures of the facility taken during previous inspections show drums and tanks stored at numerous locations outside at the facility. Documentation that spills of solvents and/or acids from the containers and tanks have not resulted in soil and water contamination as defined by 721.133(d) needs to be provided. This documentation must include a soil sampling and analysis plan as described in item 3b above.

These environmental concerns must be addressed in the certification regarding potential releases from solid waste management units, a closure plan, or a RCRA Part B permit application.

Pursuant to 725.212(d), you should submit a revised closure plan within 30 days which adequately responds to the above noted comments. Failure to submit a revised plan within 30 days will be considered non-compliance with the interim standards of 725 Subpart G -- Closure and Post-closure and Subpart H -- Financial Requirements.



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Should you have any questions concerning this matter, please contact Rob Watson at 217/782-6762.

Very truly yours,

Lawrence W. Eastep

Lawrence W. Eastep, P.E., Manager
Permit Section
Division of Land Pollution Control

/ERT

LWE:WRN:jab/609F/62-65

WJW
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